

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

Elizabeth Sines, et al

Plaintiffs

v

Jason Kessler, et al

Defendants

Case No.: 3:17-cv-072-NKM

SWORN DECLARATION OF CHRISTOPHER CANTWELL AS TO THE
EXPERT REPORTS OF SIMI, BLEE, AND LIPSTADT

I, Christopher Cantwell, do hereby aver under penalty of perjury this
2nd day of October, 2021, that the following is true and correct:

- 1) I am over 18 years of age and have personal knowledge of the following.
- 2) I previously averred as to having received a hard drive from the Plaintiffs between April 6 and 13, 2021, containg over 400 files and the restrictions on my access to that device.
- 3) Beginning September 15, 2021, I have been able to review the hard drives of para 2, supra; these drives actually contain thousands of files, not all of which I have yet been able to review.
- 4) The drives of para 2, supra, contain the expert reports of Deborah Lipstadt and of Peter Simi and Kathleen Blee; my receipt of the drive mark Plaintiff's first disclosure of this information.
- 5) Because Plaintiffs did not disclose these reports to me until April 2021, after the close of discovery. I was unable to depose Lipstadt, Simi, or Blee.

Having so averred, I sayeth no more under oath.



Christopher Cantwell